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January 2, 2024

Via ECF

The Honorable Colleen McMahon
 United States District Court
 Southern District of New York
 500 Pearl Street, Room 24A
 New York, NY 10007

Re: Collins v. Hanesbrands Inc., Case No. 1:23-cv-01818-CM

Dear Judge McMahon:

I represent Plaintiff in the above-captioned action. Together with counsel for Defendant, the parties jointly write to request a 60-day stay of proceedings in this matter in order for the parties to focus their efforts on potential resolution through private mediation. Prior to the expiration of the stay, the Parties will jointly file a status report to inform the Court of their progress.

In the event the Court wishes to proceed as scheduled, the parties hereby jointly submit the attached proposed Case Management Plan in advance of the January 4, 2023 Initial Conference. Should the Court choose not to cancel the Initial Conference, the Parties hereby request to appear at the Initial Conference via telephone. Appearances via telephone would serve the interests of the case and the Court because they would allow the Parties to minimize travel time and expenses which could otherwise be directed towards a potential resolution of the matter. Thank you for your attention to this matter.

Respectfully,

Y. Kopel

Yitzchak Kopel

CC: All counsel of record via ECF

Encls.

1/3/2024
 This case is dead
 10 months old and
 nothing has been done.
 Please do something
 papers

Colleen McMahon

Yitzchak Kopel
 have a 60 day stay +
 then have 90 days +
 before we do discovery.
 no motion will stay discovery or